

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
vs.) NO. 04-30004-MAP
)
ROOSEVELT ARCHIE)

JOINT MOTION TO CONTINUE SENTENCING HEARING

Now comes the defendant, and the Government, in the above entitled matter and requests this Honorable Court continue the Sentencing Hearing presently scheduled for 2/21/06 to another date convenient to all parties; and asserts as his reasons, therefore, counsel requires an additional 90 days in order to resolve outstanding issues contemplated by the Plea Agreement.

Counsel has conferred with Assistant United States Attorney, Paul Smyth, Esq., who has no objection to the allowance of this motion.

THE DEFENDANT

/s/ Paul H. Smyth
AUSA Paul Smyth

BY: /s/ Vincent A. Bongiorni
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CERTIFICATE OF SERVICE

I, Vincent A. Bongiorni, Esq., do hereby certify that I have served a copy of the foregoing to Assistant United States Attorney, Paul Smyth, Esq., United States District Court, 1550 Main Street, Springfield, MA. 01103 this 5th day of January 2006.

Vincent A. Bongiorni